

# Exhibit 1

RE: Kim Sams

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From: Prather, Laura (laura.prather@haynesboone.com)  
To: tyclevenger@yahoo.com  
Cc: stevenbiss@earthlink.net; bodneyd@ballardspahr.com  
Date: Friday, January 31, 2020, 02:34 PM CST

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Ty,

I received your email below. Please advise as to whether you will be representing Ms. Sams.

Your email indicates that Ms. Sams is willing to “cooperate.” However, she has not done so thus far.

You also state that Ms. Sams has “no responsive documents.” However, given certain materials we have received from other third parties, it is inconceivable that she has no responsive documents.

Ms. Sams needs to respond to our motion to compel in compliance with the rules, through lawyers who are licensed in the Northern District of Texas.

Take care,

Laura

**Laura Lee Prather**, Appellate Law Board Certified  
Partner  
(t) +1 512.867.8476

Licensed in Texas, California, New York, and D.C.

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**From:** Ty Clevenger <tyclevenger@yahoo.com>  
**Sent:** Friday, January 24, 2020 12:05 PM  
**To:** Prather, Laura <Laura.Prather@haynesboone.com>  
**Cc:** Steven S. Biss <stevenbiss@earthlink.net>  
**Subject:** Kim Sams

<b>EXTERNAL:</b> Sent from outside haynesboone
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Laura,

I just spoke with Kim Sams about the attached subpoena. She had been told that this matter was being handled by counsel, and obviously it was not. She is willing to cooperate, but she informed me that she has no responsive documents whatsoever. Please call me at 202-577-8606 at your convenience.

Ty

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